

JASON HICKS, ESQ.  
Nevada Bar No. 13149  
**GREENBERG TRAUIG, LLP**  
10845 Griffith Peak Drive, Suite 600  
Las Vegas, Nevada 89135  
Telephone: (702) 792-3773  
Facsimile: (702) 792-9002  
Email: Jason.Hicks@gtlaw.com

NAOMI BEER, ESQ.  
*\*pro hac vice forthcoming*  
**GREENBERG TRAUIG, LLP**  
1144 15<sup>TH</sup> Street, Suite 3300  
Denver, Colorado 80202  
Telephone: (303) 572.6549  
Email: [beern@gtlaw.com](mailto:beern@gtlaw.com)

***Counsel for Defendants SUNRISE HOSPITAL AND  
MEDICAL CENTER, LLC, and HCA HEALTHCARE, INC.***

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

AYNUR KABOTA, on behalf of herself and all  
other similarly situated individuals

Plaintiffs,

v.

SUNRISE HOSPITAL AND MEDICAL  
CENTER, LLC; HOSPITAL CORPORATION  
OF AMERICA, d/b/a HCA HEALTHCARE,  
INC.; and DOES 1 through 50, inclusive,

Defendants.

CASE NO. 2:25-cv-00684-MMD-DJA

**STIPULATION AND ~~PROPOSED~~  
ORDER TO EXTEND DEADLINE  
FOR PARTIES TO FILE  
PROPOSED DISCOVERY PLAN  
AND PROPOSED SCHEDULING  
ORDER**

**(First Request for Time)**

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Pursuant to Local Rules IA 6-1, 6-2 and 7-1, Defendant Sunrise Hospital and Medical Center, LLC (“Sunrise”) and HCA Healthcare, Inc.<sup>1</sup> (“HCA”) (collectively, “Defendants”) and Plaintiff Aynur Kabota (“Plaintiff”) (the “Parties”), by and through their counsel, hereby stipulate as follows:

1. On November 18, 2025, Defendants each filed their Answers to Plaintiff’s Amended Complaint. (ECF Nos. 17, 18.)

2. As a result, the Parties’ Proposed Discovery Plan and Proposed Scheduling Order are due January 2, 2026. (ECF No. 17.)

3. In light of the fact that the January 2, 2026 deadline, as well as the corresponding obligation to meet and confer regarding the Parties’ proposed discovery plan and case schedule, fall during the holiday season when counsel are out of the office and at times otherwise unavailable, the Parties have agreed that the January 2, 2026 deadline should be continued by two weeks to January 16, 2026, and all related meet and confer deadlines should be continued accordingly.

4. The Parties therefore respectfully request that the Court continue the January 2, 2026, deadline to finalize and submit their Proposed Discovery Plan and Proposed Scheduling Order by two weeks, until January 16, 2026.

5. This stipulation is made in good faith and not for any improper purpose or delay.

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<sup>1</sup> HCA Healthcare, Inc. is improperly identified in the complaint as “Hospital Corporation of America d/b/a HCA Healthcare, Inc.” There is no such legal entity. Further, it is improperly identified as a defendant in this action. At all times, Sunrise was the proper employing entity of Plaintiff. HCA Healthcare, Inc. is a holding company which has no employees.

6. Based on the foregoing, IT IS HEREBY STIPULATED AND AGREED by and between the Parties through their respective counsel of record herein, and subject to Court order, that the January 2, 2026, deadline to finalize and submit their Proposed Discovery Plan and Proposed Scheduling Order is continued by two weeks until **January 16, 2026**.

Respectfully submitted this 22<sup>nd</sup> day of December 2025.

**THIERMAN BUCK**

**GREENBERG TRAURIG, LLP**

By: /s/ Leah L. Jones

By: /s/ Jason Hicks

JOSHUA D. BUCK, ESQ.  
Nevada Bar No. 12187  
LEAH L. JONES, ESQ.  
Nevada Bar No. 13161  
325 W. Liberty Street  
Reno, Nevada 89501

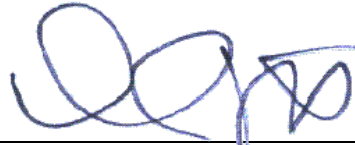
JASON HICKS, ESQ.  
Nevada Bar No. 13149  
10845 Griffith Peak Drive, Suite 600  
Las Vegas, Nevada 89135

*Counsel for Plaintiff and all  
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NAOMI BEER, ESQ.\*  
\*pro hac vice forthcoming  
1144 15<sup>TH</sup> Street, Suite 3300  
Denver, Colorado 80202

*Counsel for Defendants Sunrise Hospital  
and Medical Center, LL, and HCA  
Healthcare, Inc.*

**IT IS SO ORDERED.**



DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

DATED: 12/29/2025